



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 17 2016

CERTIFIED MAIL 7009 1680 0000 7647 3279  
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF

Mr. Todd Zink  
Accumulation Center Manager  
Safety-Kleen Systems, Incorporated  
3227 Terminal Drive  
Eagan, Minnesota 55121

Re: Notice of Violation  
Compliance Evaluation Inspection  
MND981097884

Dear Mr. Zink:

On April 20, 2016, a representative of the U.S. Environmental Protection Agency inspected the Safety-Kleen Systems, Incorporated facility located in Eagan, Minnesota (SK-Eagan). As a hazardous waste treatment, storage or disposal facility, SK-Eagan is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate SK-Eagan's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by SK-Eagan, EPA's review of records pertaining to SK-Eagan, and the inspector's observations, EPA has determined that SK-Eagan has unlawfully stored hazardous waste in violation of its permit.

**STORAGE OF HAZARDOUS WASTE IN VIOLATION OF A PERMIT**

At the time of the inspection, SK-Eagan was out of compliance with the following permit requirements:

1. **Operating Record:** The Permittee shall keep a written operating record at the Facility that contains the information in Minn. R. 7045.0578, including the location of each hazardous waste shipment or container within the Facility and the total quantity of hazardous waste at each location. This information must be complete and up to date at all times. This information must be cross-referenced to the manifest accompanying the waste.

At the time of the inspection, SK-Eagan's operating records appeared to reflect the fact that a specific container was within the facility, but did not specify the location of the container within the facility. *See* Permit Part V.B.4 (page 22).

2. Personnel Records: The Permittee shall maintain at the facility at all times a written description of the type and amount of both introductory and continuing training in accordance with the Personnel Training Plan set forth in Section 5 of the Permit Application, that will be given to each person filling a hazardous waste position.

At the time of the inspection, the file for Joe Farrington, Customer Service Representative, did not list the type and amount of both introductory and continuing training required for Mr. Farrington. See Permit Part V.C.3, page 23.

3. Personnel Records: The Permittee shall maintain at the facility at all times records that document the training provided to each employee for each position related to hazardous waste management. See Permit Part V.C.4, page 23.

At the time of the inspection, SK-Eagan was unable to provide records for Todd Zink, for training in 2005; Dale Content, for training in 2004 and 2005; Craig Ruesink, for training in 2002 to 2007; Ken Reckinger, for training in 2002 to 2005; Joe Starin, for training in 2002 to 2007; and Todd Fitterer, for initial training within six months of his 05/01/2006 hire date.

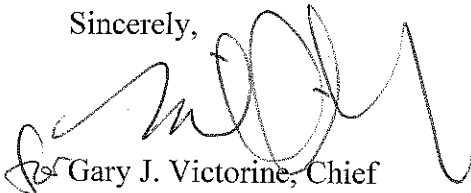
#### RECOMMENDATION

EPA has a recommendation related to the marking of the pipes leading to the hazardous waste storage tanks. The pipes are currently labeled with the word, "Waste." EPA recommends SK-Eagan label the pipes with the more appropriate term, "Hazardous Waste."

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above requirements. You should submit your response to Daniel Chachakis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Chachakis, of my staff, at (312) 886-9871 or at [chachakis.daniel@epa.gov](mailto:chachakis.daniel@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: John Elling, Minnesota Pollution Control Agency ([john.elling@state.mn.us](mailto:john.elling@state.mn.us))



U. S. Environmental Protection Agency  
Region 5, Land and Chemicals Division  
RCRA Branch  
77 West Jackson Boulevard  
Chicago, Illinois 60604

## RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** Safety Kleen Systems, Incorporated

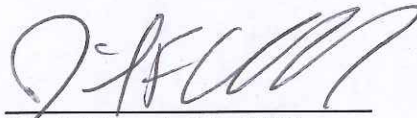
**EPA ID NUMBER:** MND981097884

**ADDRESS:** 3227 Terminal Drive  
Eagan, Minnesota 55121

**DATE OF INSPECTION:** April 20, 2016

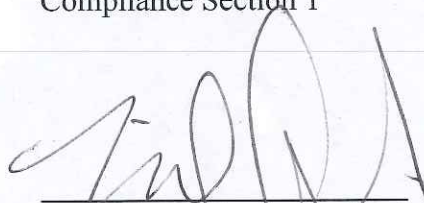
**EPA INSPECTOR:** Daniel Chachakis  
Environmental Protection Specialist

**PREPARED BY:**

  
Daniel Chachakis, EPS  
Compliance Section 1

05/05/2016  
Date

**APPROVED BY:**

  
Michael Cunningham, Chief  
Compliance Section 1

5/5/16  
Date



**Purpose of Inspection:** This inspection was an evaluation of the Safety Kleen Systems, Incorporated's (Safety Kleen) compliance with hazardous waste, used oil, and universal waste regulations found at Minnesota Regulations 7001, 7045 and 7046, and the Code of Federal Regulations (CFR) and the Facility's Hazardous Waste Permit. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as a hazardous waste storage facility (TSDF) and a large quantity generator (LQG).

**Participants**

*Inspector(s):*

Daniel Chachakis, EPS, EPA

*Site Representative(s):*

Greg Nelson, Branch General Manager

Todd Zink, Accumulation Center Manager

Kelly Taylor, Environmental Health and Safety Manager (by conference call)

**Introduction:** I downloaded the following picture of the site from Google Maps.

3227 Terminal Dr - Google Maps

Page 1 of 1



On April 20, 2016, I arrived at the site at approximately 8:15 AM. I introduced myself, presented my inspector credential, signed in without signing away any government rights, and was escorted to a table area. I again presented my credentials to Mr. Nelson and Mr. Zink, exchanged business cards, and described the purpose and process by which I intended to conduct the inspection. Mr. Nelson and Mr. Zink provided us with a description of the site operations, led the tour, and provided me with the records I requested for review. Ms. Taylor joined our discussion by conference phone.



I provided a Small Business Resources information sheet and the Minnesota Technical Assistance Program brochure to Mr. Nelson. We discussed the site tour and the following safety equipment was recommended or required: safety glasses, steel-toed boots, and hard hat.

I informed Mr. Nelson and Mr. Zink that Safety Kleen could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Safety Kleen did not make a CBI claim on the information gathered during the inspection.

**Site Description:** I conducted research on the site. I read the Federal Permit dated June 9, 2011 and recorded the following.

- The site covers 3.9 acres.
- Safety Kleen stores, and prepares for shipment, spent parts washer solvent. Safety Kleen stores hazardous waste in tanks and containers, and operates a miscellaneous unit: a return and fill drum washing unit. The door on the drum waste unit is to remain closed when operating. Safety Kleen stores dry cleaning wastes, immersion cleaner wastes, paint wastes, photographic imaging wastes, and aqueous parts cleaner waste.
- Safety Kleen generates waste mineral spirits that are collected and sent to a recycling center, dumpster mud that is collected and sent to a recycling center, and sludge from the storage tank that is collected and sent to a recycling center.
- Safety Kleen operates a transporter 10-day storage area, a 17,000 gallon hazardous waste storage tank, a 4,900 gallon container storage area, and an 88,000 gallon container accumulation center. The container storage areas are required to have three feet of aisle space. Each container is to be marked with the contents and the date accumulation begins, with a one year storage limit.
- Safety Kleen is not permitted to store PCB waste greater than or equal to 50 ppm.
- Requirements for the hazardous waste storage tank system: Open ended valves or lines must be equipped with a cap, plug, or other device. Subpart BB "in light liquid service" requirement: monthly leak detection monitoring.
- Subpart CC applies to containers and tanks.
- Facility records should contain five plans (personnel Training, Waste Analysis, Contingency, Closure and Closure Costs, and Inspection), financial assurance, and the annual report.

Mr. Nelson explained that three of Safety Kleen's business operations are located at the facility. The three are Parts Washers, Containerized Waste, and Used Motor Oil. The fourth, Vacuum (to collect oily water), does not occur at the facility.

Mr. Zink explained that:

- Hazardous waste accumulated at the site is sent by truck to other Safety Kleen facilities for recycling or disposal. Waste at this site is accumulated from six facilities. The hazardous waste storage tank holds spent solvent. The other containers received at the facility are never opened, just consolidated for transport. He also explained that any hazardous waste considered generated at the site, with the exception of the wastes generated from the operation of the hazardous waste storage tank, are actually hazardous wastes generated at other customer facilities, consolidated and “terminated” at the Safety Kleen Eagan facility, then re-manifested to other Safety Kleen facilities for final recycling or disposal.
- The site generates hazardous waste, used oil and universal waste lamps and batteries. The site accumulates its onsite generated waste in containers. The site receives containerized hazardous waste which is stored and later transported to other locations. The site receives containerized spent solvent that are emptied into a storage tank. The accumulated spent solvent in the storage tank is shipped by truck to other Safety Kleen locations for recycling.
- The site has storage tanks for Clean Solvent, Used Oil, and has a transportable Frack Tank. The storage building is sloped and curbed, and there are pits throughout the building able to contain spills. There are pits located at the loading docks to collect any spills.
- The parking lot has a drain with a closed valve; the drain and its associated underground piping leads to the river behind the facility. Any liquids accumulated in the parking lot, including rain, is evaluated by sight and smell and, if no solvent detected, allowed to drain into the river.
- The site also blends non-hazardous soap products for sale to customers.

I am to mail correspondence to Ms. Taylor, at [kelly.d.taylor@eafety-kleen.com](mailto:kelly.d.taylor@eafety-kleen.com).

We began the site tour.

**Site Tour:** I observed facility operations including: satellite accumulation areas, the less-than 90-day accumulation containers, the hazardous waste storage tank, solid waste areas, product storage areas, used oil storage, universal waste accumulation, and emergency equipment. I took photographs of the various facility operations, waste operations, and waste storage/accumulation areas during the site tour.

Mr. Zink explained that the spent solvents are terminated into the hazardous waste storage tank, and that containers holding materials that are not spent solvents are held in the 10-day transport storage area. We started at the Liquid Product Storage Area.

*Liquid Product Storage Area:* I observed, and took a picture of, the liquid product storage area (Picture 1).



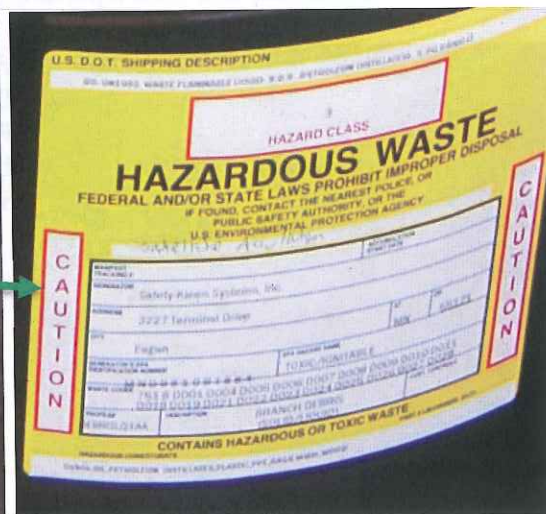
**Picture #: 1 [DSCN0044]**  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Liquid Product Storage Area  
**Subject:** Overview of the area

We moved to the Maintenance Area

*Maintenance Area:* I observed, and took a picture of, what Mr. Zink described as a satellite hazardous waste container for used rags (Picture 2).

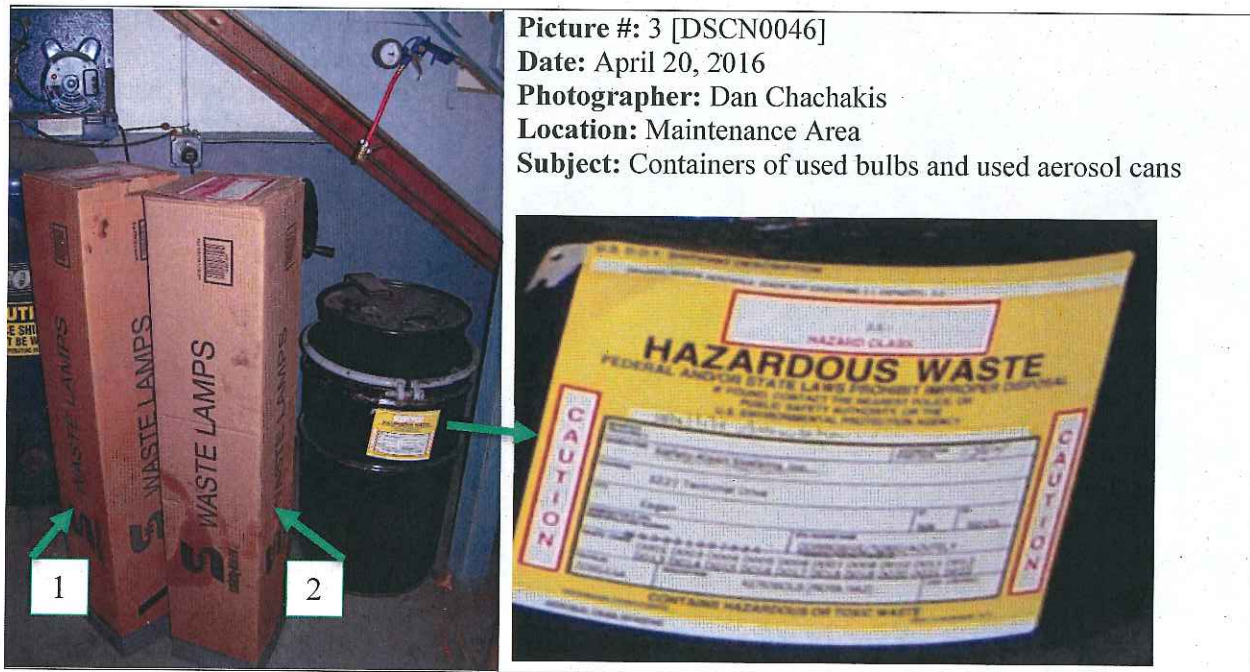


**Picture #: 2 [DSCN0045]**  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Maintenance Area  
**Subject:** Satellite hazardous waste container





I observed, and took a picture of, what Mr. Zink described as a satellite hazardous waste container for used aerosol cans, and containers of used bulbs (Picture 3).

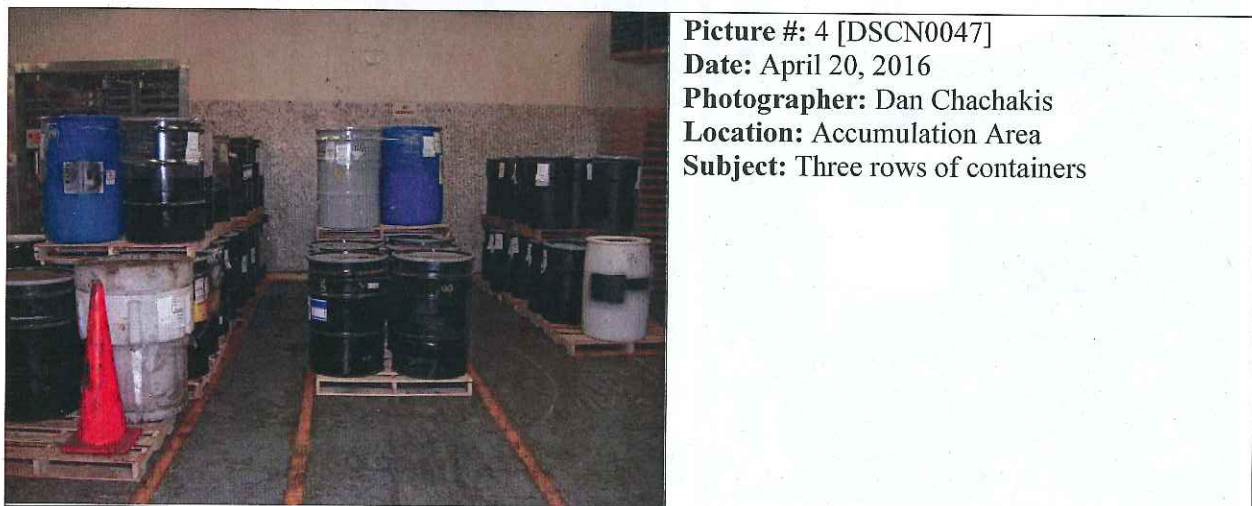


I recorded that the accumulations start date on box 1 in picture 3 was, “8-10-15”, and that the accumulation start date on box 2 was, “2-29-2016.” We moved upstairs to a product storage area.

*2<sup>nd</sup> Floor Product Storage Area:* I observed the presence of various products available for sale. We moved to the warehouse office.

*Warehouse Office:* I did not observe any issues. We moved to the Accumulation Center.

*Accumulation Center:* I observed, and took a picture of, containers in this area (Picture 4).



I reviewed the label of each container in the three rows and did not find any accumulation start date of over one year. Mr. Zink stated that the facility does not date each individual drum with the date the drum arrived at the facility, but the facility does keep a log. Mr. Kink stated that the log does not specifically state where the container is within the facility; just that the container is at the facility.

I observed, and took a picture of, two of the pits available for spill control (Picture 5), a “Panic Button” available to workers in case of emergency (Picture 6), an “emergency response” area, with phone, fire extinguisher, shower, evacuation plan, and emergency contact list (Picture 7), universal waste that the facility received (Picture 8), and spill kits (Picture 9).

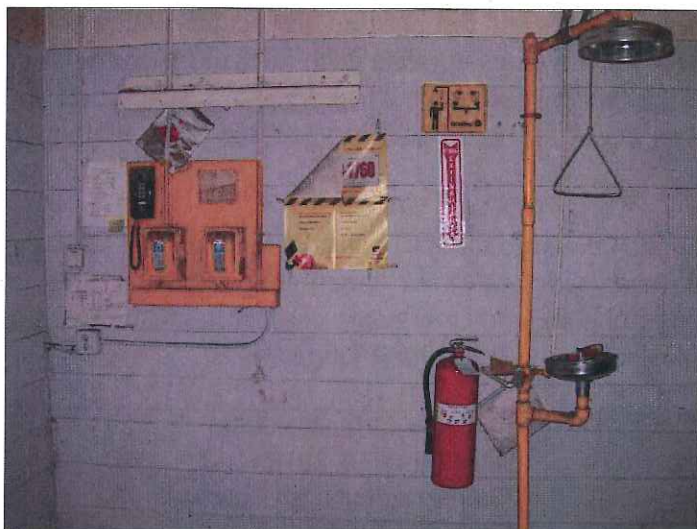


**Picture #:** 5 [DSCN0048]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Accumulation Area  
**Subject:** Spill control pits



**Picture #:** 6 [DSCN0049]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Accumulation Area  
**Subject:** “Panic Button”

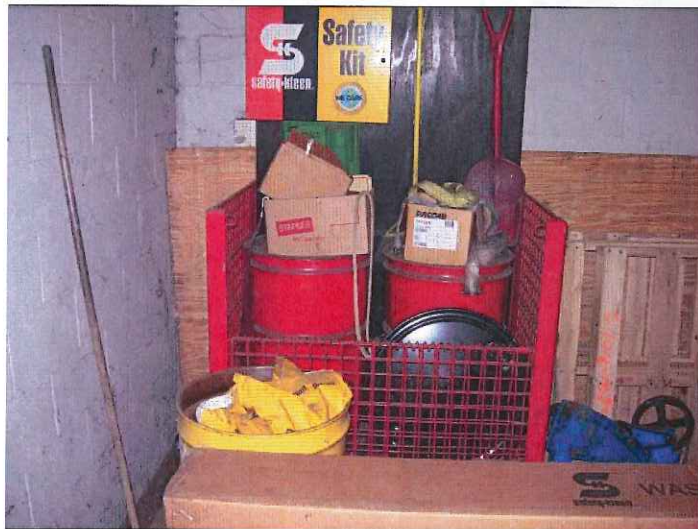




**Picture #:** 7 [DSCN0050]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Accumulation Area  
**Subject:** Emergency Response area



**Picture #:** 8 [DSCN0051]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Accumulation Area  
**Subject:** Universal waste



**Picture #:** 9 [DSCN0052]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Accumulation Area  
**Subject:** Spill kits



We discussed that it would be better if the waste storage was not in front of the spill kits (Picture 9). We moved to the product / terminated waste area.

*Product / Terminated Waste Area:* I observed, and took a picture of, three rows of materials (Picture 10).



- **Section 1:** The containers in section 1 of Picture 10 are for used oil filters. I opened the containers and observed that they were empty at the time of the inspection.
- **Section 2:** The first two pallets, stacked, in section 2 of Picture 10 (blue containers) held palletized containers of non-hazardous waste. The second pallet in section 2 of Picture 10 (black containers) held containers of hazardous waste. Mr. Zink explained that these containers were “terminated” at the facility, accumulated, then shipped to another facility with Safety Kleen – Eagan as the generator. I reviewed all labels on the containers of hazardous waste and did not find any accumulation start dates over one year.
- **Section 3:** Mr. Zink explained that this section held containers of bird flu solution, in storage in case of a bird flu outbreak. I reviewed the labels on the containers and found the labels were marked with an expiration date of, “05-15-2289.”

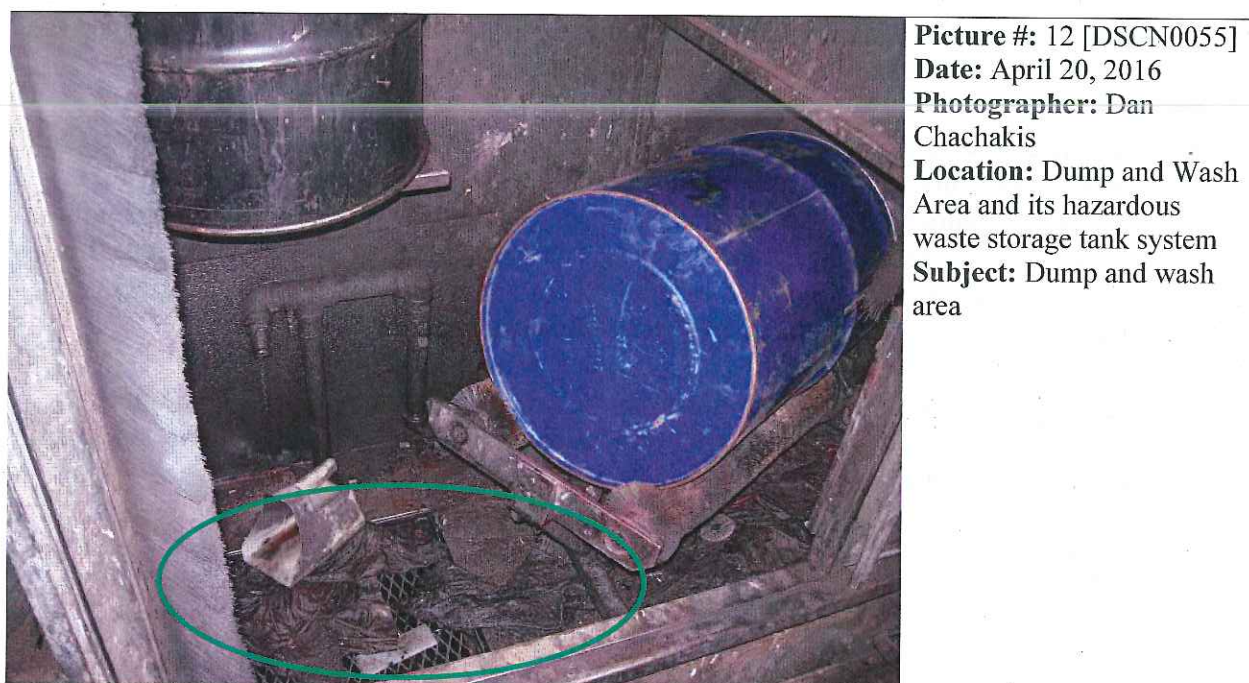


I observed, and took a picture of, used oil filter containers (Picture 11). I moved some of the containers in Picture 11; they appeared to be empty.



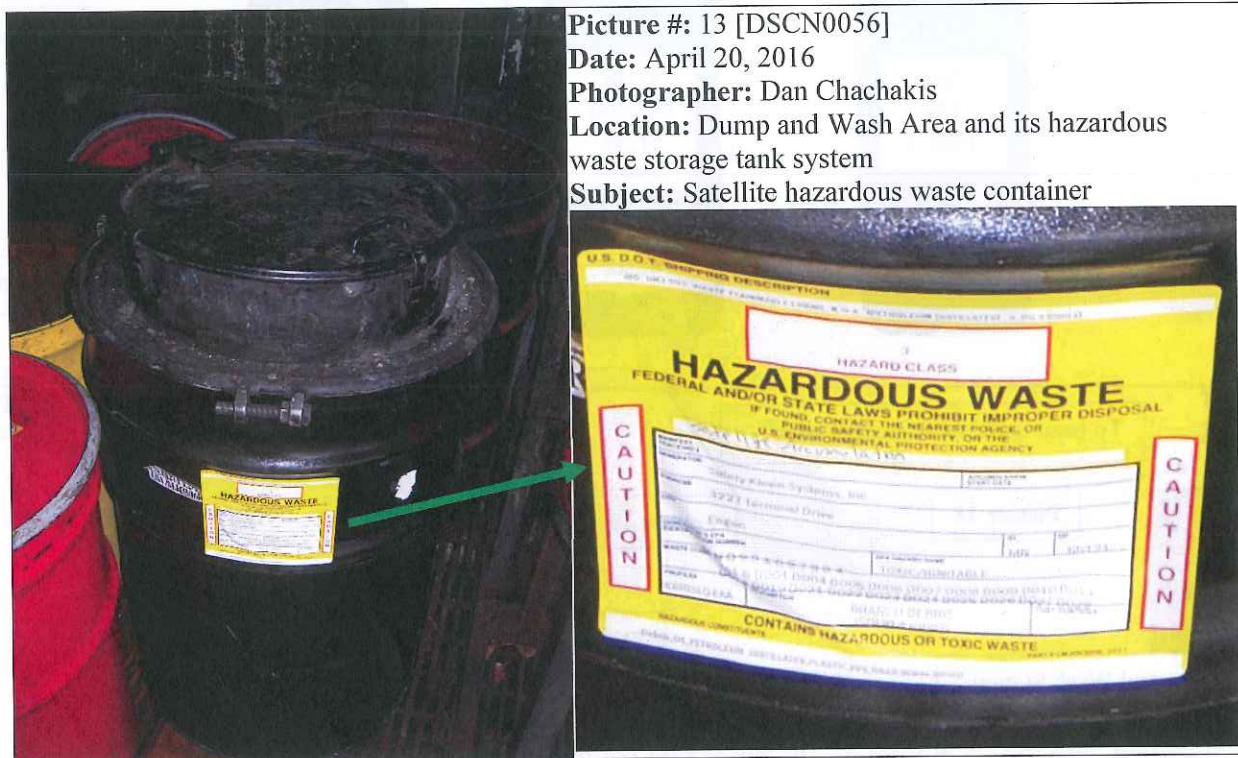
We moved outside.

*Outside:* I observed the dump and wash area and its associated hazardous waste storage tank system. When we approached the system, the outer and inner doors were closed. Mr. Zink opened the doors, and I observed, and took a picture of, the dump and wash area (Picture 12). Note the rags on the grate in Picture 12.

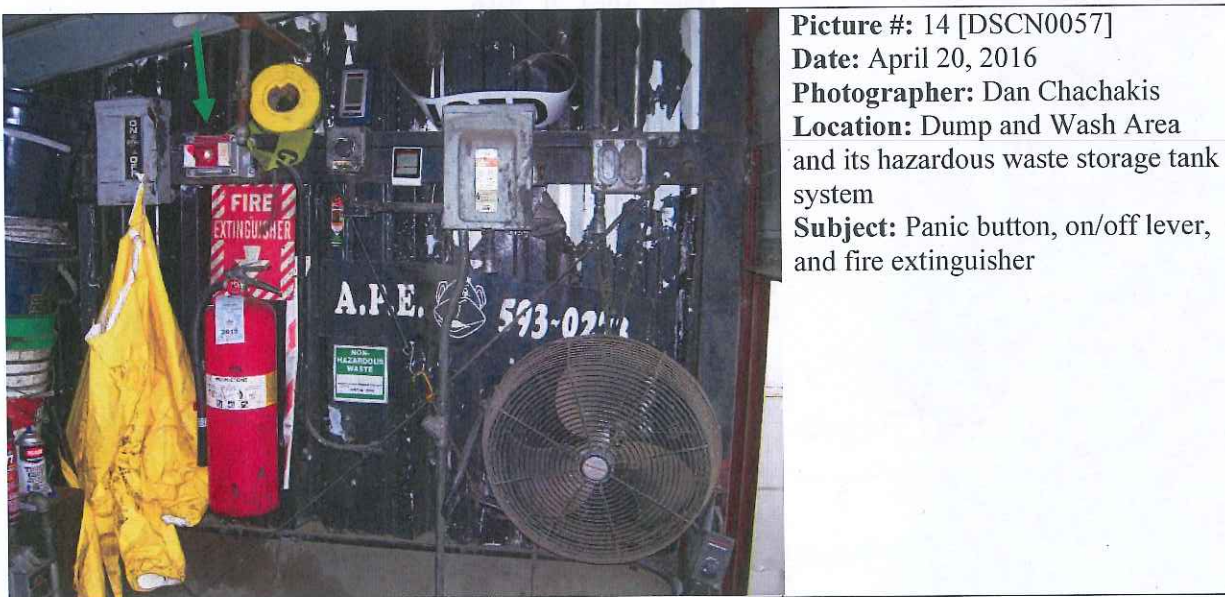




I observed, and took a picture of, what Mr. Zink described as a satellite container for hazardous waste rags and debris (Picture 13).

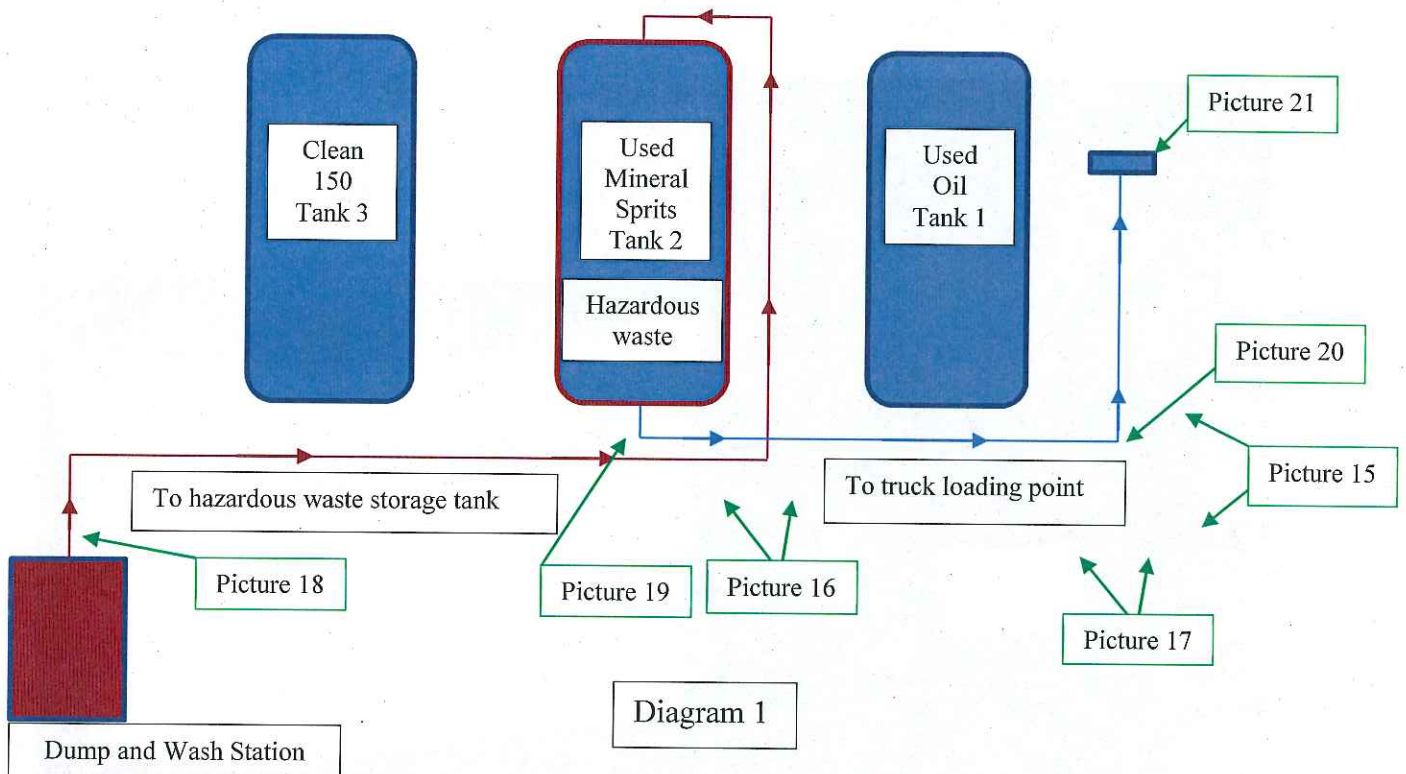


I observed, and took a picture of, a “panic button”, on/off lever, and a fire extinguisher (Picture 14)





I diagramed the hazardous waste storage tank system (Diagram 1).



I observed, and took a picture of, the pipes that leads from the dump and wash unit to the hazardous waste storage tank (Picture 15).



**Picture #:** 15 [DSCN0058]

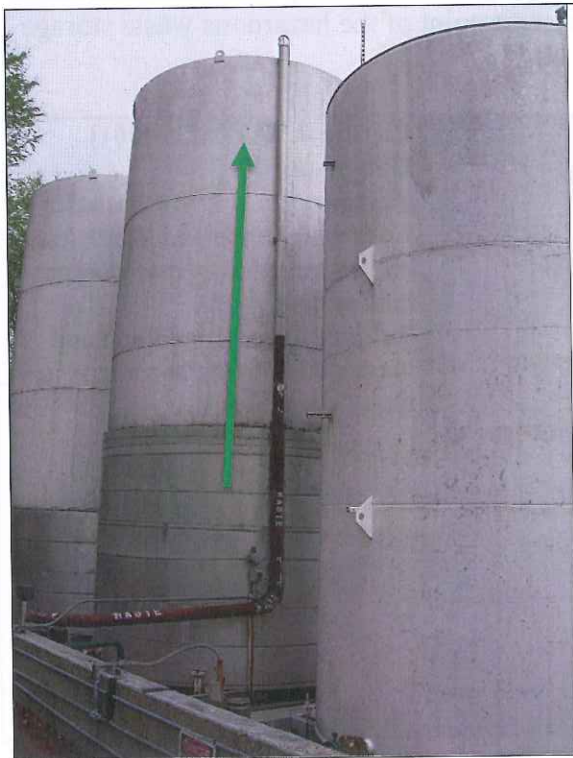
**Date:** April 20, 2016

**Photographer:** Dan Chachakis

**Location:** Dump and Wash Area and its hazardous waste storage tank system

**Subject:** Pipe to hazardous waste storage tank

I observed, and took a picture of, the pipes leading to the top of the hazardous waste storage tank (Picture 16), and the pipes leading to the truck transportation distribution point (Picture 17).



**Picture #: 16 [DSCN0059]**

**Date:** April 20, 2016

**Photographer:** Dan Chachakis

**Location:** Dump and Wash Area and its hazardous waste storage tank system

**Subject:** Pipe to top of hazardous waste storage tank



**Picture #: 17 [DSCN0060]**

**Date:** April 20, 2016

**Photographer:** Dan Chachakis

**Location:** Dump and Wash Area and its hazardous waste storage tank system

**Subject:** Pipes to the distribution point



I observed that the pipes in Pictures 15, 16 and 17 were marked with the singular word, "WASTE." I was not able to access the top of the hazardous waste storage tank due to safety considerations. I observed, and took a picture of, the piping from the dump and wash area out to the hazardous waste storage tank (Picture 18), and the exit point of the hazardous waste storage tank (Picture 19).



**Picture #:** 18 [DSCN0061]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Dump and Wash Area and its hazardous waste storage tank system  
**Subject:** Pipes from dump and wash station to the hazardous waste storage tank



**Picture #:** 19 [DSCN0062]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Dump and Wash Area and its hazardous waste storage tank system  
**Subject:** Hazardous waste storage tank exit point



I observed, and took a picture of, the bend in the pipe that leads to the truck distribution point (Picture 20).



**Picture #:** 20 [DSCN0063]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Dump and Wash Area and its hazardous waste storage tank system  
**Subject:** Bend in pipes to the distribution point

I observed, and took a picture of, the exit points at the distribution point (Picture 21)



**Picture #:** 21 [DSCN0064]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Dump and Wash Area and its hazardous waste storage tank system  
**Subject:** Pipes at the distribution point



I observed, and took a picture of, the bottom of the hazardous waste storage tank (Picture 22).



**Picture #: 22**  
**[DSCN0065]**  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Dump and Wash Area and its hazardous waste storage tank system  
**Subject:** Hazardous waste storage tank, tank 2

We continued to walk the fenced in parking lot. I observed, and took a picture of, the mobile frack used oil tank (Picture 23).



**Picture #: 23**  
**[DSCN0066]**  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Fenced in parking area  
**Subject:** Mobile frack used oil tank



I observed, and took a picture of, what Mr. Zink described as emergency bird flu response equipment (Picture 24).



**Picture #:** 24 [DSCN0067]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Fenced in parking area  
**Subject:** Emergency bird flu response equipment

Looking back at the Dump and Wash Area and its hazardous waste storage tank system, I observed a hose and pump arrangement that would allow an operator to drain material from the tank secondary containment system to the forest behind the facility. I observed, and took a picture of, the end of the hose (Picture 25). I recorded the presence of a divot in the ground that appeared to be from running water.



**Picture #:** 25 [DSCN0068]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Dump and Wash Area and its hazardous waste storage tank system  
**Subject:** End of hose



I observed, and took a picture of, the hose in Picture 25 to the pump (Picture 26).



**Picture #:** 26 [DSCN0069]

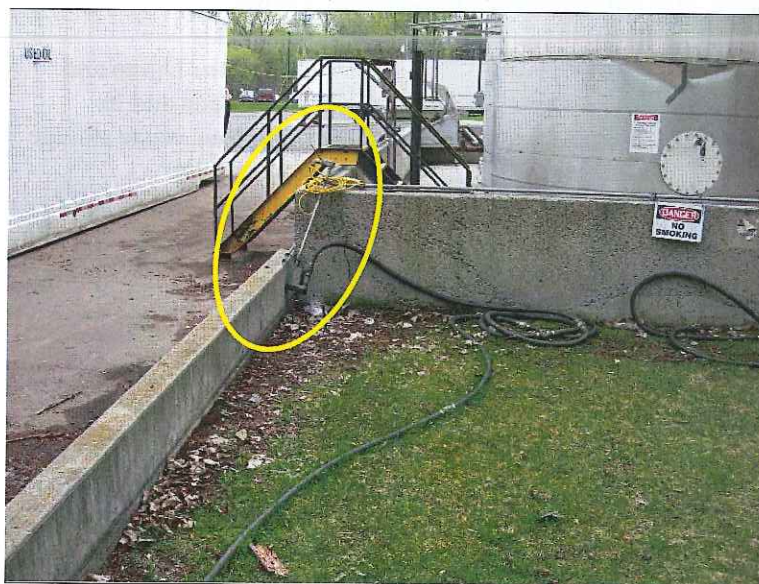
**Date:** April 20, 2016

**Photographer:** Dan Chachakis

**Location:** Dump and Wash Area and its hazardous waste storage tank system

**Subject:** Hose to pump

I observed, and took a picture of, the pump attached to the hose in pictures 25 and 26 (Picture 27).



**Picture #:** 27 [DSCN0070]

**Date:** April 20, 2016

**Photographer:** Dan Chachakis

**Location:** Dump and Wash Area and its hazardous waste storage tank system

**Subject:** Pump



Mr. Nelson and Zing stated the material flows from the secondary containment to the woods, and the material is usually rain water or snow melt. Mr. Zink explained the operator uses sight and smell to determine if the material is contaminated and, if not considered contaminated, the material is released to the environment.

We moved to, and I took a picture of, a dump and wash building that was no longer in use for dumping and washing activities, just storage (Picture 28). We went inside and I did not observe any issues. Additional blue containers for used oil filters were placed in front of the building. We opened a sample of the containers and found them empty.



**Picture #: 28 [DSCN0071]**  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Fenced in parking area  
**Subject:** Inactive dump and wash building

We went back to the hazardous waste storage tank. I observed, and took a picture of, the tank used solvent level (Picture 29).



**Picture #: 29 [DSCN0072]**  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Dump and Wash Area and its hazardous waste storage tank system  
**Subject:** Hazardous waste storage tank, tank 2, level



We found the level in Picture 29 to be approximately 6 ½ inches. Using an operator provided conversion chart, the operator converted the inch level to 4,265 gallons. I observed the presence of overfill alarms for all tanks.

I moved to the center of the fenced in parking area. I observed, and took a picture of, what Mr. Zink described as a dead drain (Picture 30).



**Picture #:** 30 [DSCN0073]  
**Date:** April 20, 2016  
**Photographer:** Dan Chachakis  
**Location:** Fenced in parking area  
**Subject:** Dead drain

We moved to various offices to conduct a Records Review.

**Records Review:** I reviewed waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), daily container inspection logs, daily tank inspection logs, and the contingency plan. I completed a TSD, a Tanks at a TSD, and a LQG checklist during the records review, *see* Attachment A.

*Manifests:* I observed that manifests were onsite for three or more years and were available for inspection. I reviewed the following manifests from 2016 for which the facility was the 10 day transfer facility. Note that these manifests were part of one truck load, and that the number of manifests was not unusual for one truck load. There were 72 trailers loads of manifests for 2016 available for review.

004872766SKS	004872705SKS	004872709SKS	004872736SKS	004873019SKS
004872901SKS	004873094SKS	005282685SKS	005282377SKS	005091143SKS
004770159SKS	005282877SKS	005301114SKS	005015074SKS	005301728SKS
005067081SKS	005067085SKS	005067064SKS	005067060SKS	005029881SKS
005282621SKS	005282618SKS	005091511SKS	005282888SKS	005282886SKS
005282883SKS	005282935SKS	005280878SKS	005279580SKS	005301160SKS
005067082SKS				



I reviewed terminated manifests for hazardous wastes received at the facility in 2016. The facility became the generator for these wastes once it was shipped to another TSDF. These manifests were from the "Cloquet Branch."

005423360SKS	005423363SKS	005423361SKS	005423369SKS	005067089SKS
005423381SKS	005415387SKS	005067061SKS	005415383SKS	005067036SKS
005410795SKS	005410810SKS	005410798SKS	005067031SKS	005067021SKS
005406869SKS	005406857SKS	005406858SKS	005406800SKS	005406871SKS
005067017SKS	005206384SKS	005206385SKS	005067362SKS	005067366SKS
005206378SKS	005196572SKS	005203810SKS	005203808SKS	005203800SKS
005280499SKS	005067333SKS	005196566SKS	005067309SKS	005196399SKS
005067247SKS	005190355SKS	005280014SKS	005240496SKS	005067244SKS
005280018SKS	005280012SKS	005280022SKS	005067214SKS	005188374SKS
005240153SKS	005188358SKS	004782879SKS	005185408SKS	005240182SKS

I reviewed manifests for shipment of hazardous waste form the facility to Clean Harbors, Kimball, NE, in 2016.

005282445SKS	005282436SKS	005282427SKS	005282424SKS	005282421SKS
005282408SKS	005282403SKS	006873553FLE		

I reviewed manifests for shipments from the facility to Safety Kleen, Dolton, IL, in 2016.

005282446SKS	005282440SKS	005282437SKS	005282435SKS	005282434SKS
005282432SKS	005282430SKS	005282428SKS	005282426SKS	005282415SKS
005282413SKS	005282401SKS	006873554FLE		

For all manifests, I observed that some had continuation sheets that were hand written to add additional transporters.

*Inspection Program:* I observed that facility workers recorded inspections on an I-Pad. Mr. Zink showed me how the workers could access the results on the company's computer system. The workers appeared to conduct inspections onsite each day, including weekends. Mr. Zink and Mr. Nelson, along with two other facility workers, indicated that there are nine inspections on the first day of the week, seven on the additional weekdays, three on Saturdays, and four on Sundays. Any issues are flagged in red. I observed red entries in the online inspection system. Mr. Nelson stated the hazardous waste storage tank is inspected daily, including weekends. However, both Mr. Nelson and Mr. Zink stated that the facility does not use instrumentation to inspect for leaks from the hazardous waste storage tank system; workers use sight and smell. Mr. Zink stated the container storage areas are inspected daily, excluding weekends when there are no workers in the area.

*Training Program:* Mr. Nelsons stated there are approximately 18 workers onsite, and that all receive training in the hazardous waste program. Mr. Nelson and Mr. Zink provided training

records for the workers in their respective areas. I was provide records from onsite hard-copy files and an online training management system. I reviewed the records for six workers.

- Todd Zink  
Accumulation Center Manager  
Job Description, Duties and Responsibilities in file.  
Training records online and in file.  
Start date 06/01/1987, Start date 11/02/2022, missing records for 2005.
- Joe Farrington  
Customer Service Representative  
Hire date 4/6/2009, training 08/18/2009  
Job Description, Duties and Responsibilities in file  
Training records online and in file.  
File does not list required training, both initial and annual.
- Todd Fitterer  
Job Description, Duties and responsibilities in file.  
Annual training since 10/2007.  
Hire date 05/01/2006. No training records within 6 months.
- Ken Reckinger  
Material Handler, Branch  
Job Description, Duties and Responsibilities in file  
Start date 11/02/2002. Missing training from 2002 to 2005.
- Joe Starin  
Customer Service Representative, Vacuum  
Job Description, Duties and responsibilities in file.  
Start date 11/02/2002. Missing training from 2002 to 2007.
- Craig Ruesink  
Customer Service Representative, Oil  
Job Description, Duties and Responsibilities in file.  
Start date 11/02/2002. Missing training from 2002 to 2007.

I recorded that the printouts from the online training management system did not list the hazardous waste courses on the list of required courses. I received a copy of Mr. Zink's online training record. *See Attachment B, RCRA001.*

- Dale Contant  
Accumulation Center Driver  
Job Description, Duties and Responsibilities in file.  
Hire date 06/24/2002, Initial training 08/05/2002.  
Missing entry for 2004 and 2005 training in online training record. Received copy of page 3 of the online training record from Mr. Zink. *See Attachment B, RCRA002.*



- D Mario Bailey  
Start date 12/03/2014  
SPARK training, with a hazardous waste component, 01/16/2015  
RCRA training 04/07/2015, 04/08/2016.

Mr. Zink provided me with a copy of the training matrix. *See Attachment B, RCRA003.*

*SPCC Plan:* I reviewed the SPCC plan. I observed that the plan addressed spill response.

*RCRA Permit:* I reviewed the onsite facility permit. The permit contained the Waste Analysis Plan, the Personnel Training Plan, the Contingency Plan, the Closure Plan, and the Inspection Plan. I reviewed all the plans. I found that the waste analysis plan did not address what was actually happening at the facility, see *Waste Analysis Records*, below I found that the contingency plan did not contain the emergency equipment list, see *Contingency Plan*, below.

*Waste Analysis Records:* Both Mr. Nelson and Mr. Zink stated that the facility does not conduct onsite waste analyses. The determinations occur at the generator or at other Safety Kleen locations, and are recorded in the company's online data management system. I reviewed the analyses in the online data management system.

*Closure Costs:* The permit listed closure costs, and the facility provided annual updates to MPCA for cost estimate increases. The company uses a certificate of insurance for closure. The document is for three facilities at a total coverage of \$1,295,787, with \$103,299 reserved for the Safety Klee Eagan facility.

*Contingency Plan:* The current contingency plan did not contain an equipment list with location and capability. Mr. Zink provided me with a copy of the equipment list that the facility will include in the next version of the plan. *See Attachment B, RCRA004.*

**Closing Conference:** I conducted a closing conference with Mr. Nelson, Mr. Zink, and Ms. Taylor who participated by conference call. We summarized the training issues identified during the inspection, and we discussed the non-use of instrumentation during the inspections. I again mentioned that Safety Kleen could make claims of CBI on the material copied, photographs, and information gathered during the inspection. The site representatives did not make any CBI claims. The inspection concluded at approximately 4:30 PM.

#### **Attachments**

- A. Checklists
- B. Documents Copied





# **ATTACHMENT A**

## **Checklists**







MINNESOTA POLLUTION CONTROL AGENCY  
TANKS at a Permitted TSD Facility - INSPECTION CHECKLIST

I. GENERAL INSPECTION INFORMATION

Site Name: <i>Safety Klean Systems</i>	EPA ID Number: <i>MND981097884</i>
Address: <i>3227 Terminal Drive</i>	Waste Activity: <i>Permit Storage, LOG</i>
City: <i>Eagan, MN</i>	Zip/9 Digit: <i>55121</i>
County: <i>Dakota</i>	District:
	Waste generated per month <i>22,231 pounds</i>
Current Number of Employees: <i>218</i>	Years in Business or Date Company Started: <i>07/05/1985</i>
Date of last MPCA Hazardous Waste Inspection: <i>09/10/2014</i>	
Inspection Date: <i>09/20/2016</i>	Time: From <i>0815</i> to <i>1630</i>

LEAD INSPECTOR: <i>Dan Chachakis, EPA</i>	Phone # <i>312-886-9871</i>
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*Use with checklist for a TSD Facility, and attach thereto.*

Information about tanks

Tank Identification	Description of waste	Waste Codes	Capacity
<i>Tank 2, Used Mineral Spirits</i>	<i>0001 Spent Solvent</i>	<i>0001</i>	<i>17,000 gallons</i>



**MINNESOTA POLLUTION CONTROL AGENCY**  
**TANKS at a Permitted TSD Facility - INSPECTION CHECKLIST**

Storage Requirements			
Rule	Requirement	Compliance Status	Remarks
7045.0528 4, A	Do all tanks have secondary containment?	C	One Tank
7045.0528 4, C,1	Is secondary containment material compatible with storage waste?	C	
7045.0528 4, E,3	Is secondary containment free of cracks or gaps?	C	
7045.0528 4, C,3	Is there a leak detection system intact, able to detect a leak within 24 hours or the earliest possible time?	C	
7045.0528 4, E,1	Does secondary containment have adequate capacity (100% of volume of largest tank)?	C	
7045.0528 4, C,4	Is the secondary containment designed or operated to prevent inflow of precipitation OR for each removal of precipitation?	C	Removal
7045.0528 4, B,1	Is secondary containment constructed with liquid stops (caulking, coating) at the joints and is it lined or coated to prevent migration out of the system?	C	
7045.0528 4, H	Is ancillary equipment provided with secondary containment (trench, jacketed, double walled)?	C	
7045.0528 4, H,2	Does ancillary equipment have <u>welded fittings</u> or welded flange fittings that undergo documented daily inspections?	C	
7045.0528 9, A	Does the closure plan include the cleaning, dismantling and disposing of the tank systems?	C	
7045.0528 6, B,1	Do adequate spill prevention controls exist (check valves, dry disconnects, etc.)?	C	
7045.0528 6, B,2	Do adequate overfill controls exist (high level alarms, auto feed cutoff, etc.)?		

*No process vents - not AA*

Compliance Status: CO = In Compliance, NC = Non-compliant, NI = Not Inspected, NA = Not Applicable





# MINNESOTA POLLUTION CONTROL AGENCY

## TANKS at a Permitted TSD Facility - INSPECTION CHECKLIST

Storage Requirements			
Rule	Requirement	Compliance Status	Remarks
7045.0528 6, B,3	If tank is open, is adequate freeboard maintained to prevent overtopping by wave or wind action of by precipitation?	NA	
7045.0528 7, A	Is there a daily inspection (and schedule) which covers the following items: overfill, spill equipment, corrosion and degradation of tanks, degradation of secondary containment, the data gathered from monitoring equipment and leak detection systems, evidence of spills or leaks, ancillary equipment and secondary containment for ancillary equipment?	C	
7045.0528 7, C,1	If there is cathodic protection (USTs), are annual inspections made of the cathodic protection system to ensure proper functioning?	NA	
7045.0528 7, C,2	If there is cathodic protection (USTs), are bi-monthly inspections/testing made of all sources of impressed current?	NA	
7045.0528 8, B,2	Are leaks/spills into the secondary containment of the tank system detected and removed within 24 hours?	NA	
7045.0528 8, D,1	Have releases to the environment (in excess of 1 lb.) been reported to the MPCA Commissioner within 24 hours of detection?	NA	
7045.0528 8, E,3	If a tank system has leaked, was it repaired prior to returning the system to service?	NA	
7045.0528 10, A	Has waste been treated, mixed or otherwise rendered nonreactive or not ignitable (except in emergency conditions)?	NA	
7045.0528 10, B	If contents are ignitable or reactive, is the tank protected from conditions that may cause it to ignite (e.g. use of spark proof tools) or protected from contact with materials that may cause it to react?	<del>C</del>	
7045.0528 10	Is the required "Minnesota Uniform Fire Code" buffer zone provided between the tank system and public ways or adjoining properties? AND does the waste analysis plan include analysis needed to comply with the special requirements for ignitable or reactive waste?	<del>C</del>	

Subject to BB: Visual and factory inspections

Compliance Status: CO = In Compliance, NC = Non-compliant, NI = Not Inspected, NA = Not Applicable



# MINNESOTA POLLUTION CONTROL AGENCY

## TANKS at a Permitted TSD Facility - INSPECTION CHECKLIST

Storage Requirements			
Rule	Requirement	Compliance Status	Remarks
7045.0528 3, A	Does the owner/operator have a certification by an independent professional engineer, attesting that the tank system design is adequate, waste and system materials are compatible and corrosion protection will be adequate?	C	In permit
7045.0528 3, G	Does the owner/operator have a certification of proper installation from an independent professional engineer or installation inspector?	C	"
7045.0528 3, B	Does the certification of proper installation discuss: weld breaks, punctures, scrapes on protection coatings, cracks, corrosion, and other damage or independent construction?	C	"
7045.0528 3, D	Can the owner/operator provide documentation that the tank and ancillary equipment was tightness tested prior to being placed in service?	C	"
7045.0655 3, A	If the tank is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	NA	
7045.0655 3, B	If the tank is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the company follow a written inspection schedule for inspection of all monitoring equipment, security devices and operating and structural equipment?	NA	
7045.0655 3, E	If the tank is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	NA	

Compliance Status: CO = In Compliance, NC = Non-compliant, NI = Not Inspected, NA = Not Applicable



# Minnesota Pollution Control Agency

Report Title: Treatment, Storage, Disposal Facility (TSDF) Compliance Evaluation Inspection Checklist

Preferred ID: MND 981 09781 Regulated Party: Safety Kleen - Eagan

Date: 04/20/2016 Inspector: Dan Chachakis

FC: Licensing / EPA / Permits			
Rule	Requirement	Compliance Status	Remarks
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	NE	Has a license
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	NA	
FC: Waste Analysis Requirements			
Rule	Requirement	Compliance Status	Remarks
7045.0458 2, A	Does the waste analysis plan contain parameters for analysis and rationale for selection of those parameters?	C	However, testing not done at this facility
7045.0458 2, B	Does the Waste Analysis Plan contain test methods to fit the selected parameters? (including TCLP if appropriate)	C	
7045.0458 2, C	Does the Waste Analysis Plan contain suitable methods of sampling?	C	
7045.0458 2, D	Does the Waste Analysis Plan contain frequency of analysis / review information?	C	Annual
7045.0458 2, E	For off-site Regulated Parties, is a waste analysis supplied by each Regulated Party?	C	
7045.0458 2, F	Does the Waste Analysis Plan consider other criteria including 1) LDR Criteria, 2) Vent & equipment leak test methods and procedures (RCRA organic air emissions, Subpart AA & BB) NOTE: These items are by referral to other rules and should be cited from those rules with reference from this rule.	C	
7045.0458 2, G, 1	Are there procedures to verify the identity the waste upon arrival at the facility from an off-site generator? Checked prior to arrival at facility	<del>DP</del> C	Person through to final destination. Drivers confirm before pickup, sight, smell, volume, amount before pickup.

### FC: Waste Analysis Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0458 2, G,2	Are there sampling methods to identify the waste upon arrival at the facility from an off-site generator(s), if needed?	NA	No sampling

### FC: Operating Record

Rule	Requirement	Compliance Status	Remarks
7045.0478 2	Does the facility maintain a written operating record onsite?	C	
7045.0478 3, A	For facilities receiving hazardous waste from off-site, does the operating record contain the names and identification numbers of the generators?	C	
7045.0478 3, B	Does the operating record contain the date of arrival of each hazardous waste shipment and the transporter's name and identification number?	C	
7045.0478 3, C	Is there a description and quantity of each hazardous waste received and the method(s) and date(s) of each waste's treatment, storage or disposal?	C	
7045.0478 3, D	Does the operating record contain the location and quantity of each hazardous waste within the facility? <del>For disposal facilities, is there a map or diagram of the disposal area showing the location and quantity of each hazardous waste?</del> [This information should be cross referenced to specific manifest numbers.]	NC	Small facility
7045.0478 3, E	Are there records and results of all waste analyses, trial tests, monitoring data, and operator inspections including process vent and equipment leak test methods, procedures, and record keeping requirements (Subpart AA & BB)?	C	No on site Treatment for waste Solvent
7045.0478 3, J	Are there closure and post-closure cost estimates?	C	Thinner, Emulsion Cleaner, Perh Year: 2016, signed 1/29/16 \$ 103,299



FC: Operating Record			
Rule	Requirement	Compliance Status	Remarks
7045.0478 3, L	Is the certification signed by owner/operator or authorized rep?	C	
FC: General Facility Requirements			
Rule	Requirement	Compliance Status	Remarks
7045.0452 3, A	If facility receives hazardous waste from outside the US, has the facility given written notice to MPCA and EPA Reg.5 regarding receipt of hazardous waste from a foreign source?	NA	
7045.0452 5, C	Is the inspection frequency for items in the inspection schedule based on possible deterioration rates of equipment? AND Are areas subject to spills inspected at least daily when in use?	C	Not a corrosive material
FC: Waste Evaluation			
Rule	Requirement	Compliance Status	Remarks
7045.0458 2	Does the facility have a detailed waste analysis plan on site?	C	In permit
FC: Preparedness & Prevention			
Rule	Requirement	Compliance Status	Remarks
7045.0462 2	Are hazardous wastes managed to prevent releases?	C	
7045.0462 3, A	Does the facility have internal communications or alarm system capable of providing immediate emergency instruction?	C	Phones push button alarms
7045.0462 3, B	Is there an emergency telephone or device immediately available for summoning outside emergency responders?	C	

### FC: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0462 3, C	Does the facility have fire control, spill control, and decontamination equipment?	C	
7045.0462 3, D	Is water available in adequate volume for all fire control needs?	C	Fire hydrant. No water fire control system

### FC: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7001.0520 1	Does the Regulated Party have a storage permit?	C	

### FC: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	C	
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	NA	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	C	
7045.0474 2, A	If the facility accepts hazardous waste from off-site: a. Does the facility sign and date each manifest?	C	

FC: Manifests			
Rule	Requirement	Compliance Status	Remarks
7045.0474 2, B	b. If applicable, are any discrepancies noted directly on the manifest?	C	
7045.0474 2, D	c. Send a manifest copy to the generator and MPCA within ten days after delivery?	C	
7045.0474 2, E	d. Retain manifest copies for at least three years from the date of delivery?	C	
7045.0476 3, C	f. If applicable, notify the MPCA immediately if hazardous waste is delivered that facility is not permitted to manage?	NA	
FC: Land Disposal Restrictions			
Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	C	LDR w/ each manifest
7045.1315 2	Does the treatment facility test its wastes in accordance to the frequency specified in their waste analysis plan?	NA	
7045.1315 2, A	For wastes with treatment standards expressed in concentrations in the waste extract, has the treatment facility tested treated waste residues or an extract of the residues and does the test method comply with federal requirements?	NA	
7045.1315 2, C	For wastes with treatment standards expressed in concentrations of the waste, has the treatment facility tested the treated waste residues (not an extract)?	NA	



### FC: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
7045.1315 2, F	For waste or treated residue that is further managed at a TSD facility, has the TSD sending the waste or treatment residues complied with generator notification and certification requirements?	NA	

### FC: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0454 2	Does the Regulated Party have a Training Program Director trained in hazardous waste management procedures?	C	
7045.0454 1	Have all Regulated Party personnel who manage hazardous waste completed a training program (within 6 months of hire or transfer) that teaches the correct performance of their duties both in normal times and in times of emergency?	NC	
7045.0454 6, B	Do the records contain job descriptions?	C	
7045.0454 6, C	Do the records contain descriptions of training?	C	
7045.0454 4	Have new employees completed hazardous-waste-management training within 6 months of hiring or assignment to a new position?	C	New employee
7045.0454 5	Have employees received annual review of hazardous-waste-management training at least once per calendar year?	C	
7045.0454 7	Are employee training records retained for the lifetime of the facility or for three years after an employee leaves?	C	

FC: Contingency Plan			
Rule	Requirement	Compliance Status	Remarks
7045.0466 2	Does the facility have a contingency plan?	C	
7045.0466 5, B	Has a copy of the contingency plan been submitted to local police and fire departments, hospital or medical facility and other emergency response teams?	C	Documented
7045.0466 4, A	Does the plan specify emergency response actions and procedures?	C	Missing explosion
7045.0466 4, C	Has the facility made and documented emergency arrangements with local authorities (fire dept., police, local hospital, and other potential emergency responders)?	C	In permit
7045.0466 4, D	Does the plan list emergency coordinator address and phones data? AND Do emergency coordinators have the authority to act (commit resources)?	C	Seperate list, posted
7045.0466 4, E	Does the plan list emergency equipment and include its location and a physical description of each?	C	
7045.0466 4, F	Is there an evacuation plan?	C	
FC: Closure / Post-Closure			
Rule	Requirement	Compliance Status	Remarks
7045.0486 3	Does the facility have an approved closure plan?	C	In permit
7045.0486 3, A	Does the closure plan include: 1. A detailed description of how each hazardous waste unit will be closed, and how the facility will finally be closed?	C	

### FC: Closure / Post-Closure

Rule	Requirement	Compliance Status	Remarks
7045.0486 3, B	2. An estimate of the maximum inventory of hazardous waste ever stored on-site during the active life of the facility and a detailed description of methods to be used during partial and final closure of the facility?	C	
7045.0486 3, C	3. A detailed description of steps needed to remove or decontaminate residual hazardous waste and equipment at the site?	C	
7045.0486 3, E	4. A schedule for closure of each hazardous waste unit and final closure of the facility?	C	
7045.0486 3, F	For facilities that use trust funds to establish financial assurance: Does the facility have an estimate of the expected year of closure?	NA	Certificate of Insurance Indian Harbor Insurance Co #1,295,787
7045.0486 4	Did the facility properly amend the closure plan, if required?	NA	for multiple facilities Engani #103,299
7045.0502 1	Does the facility have a closure cost estimate?	C	
7045.0502 2	Do the cost estimates include adjustments for inflation?	C	
7045.0490 2	For Disposal Facilities and specified others, does the Regulated Party have an approved post-closure plan?	NA	
7045.0490 3, A	Does the Postclosure Plan include a detailed description of the planned monitoring activities and frequencies at which they are performed after closure?	NA	
7045.0490 3, B	Does the Postclosure Plan include a description of the planned maintenance activities and the frequencies at which they will be performed after closure?	NA	



FC: Closure / Post-Closure			
Rule	Requirement	Compliance Status	Remarks
7045.0490 3, C	Did the facility properly amend the Postclosure Plan, if required?	NA	
7045.0506 1	Does the facility have current cost estimates for postclosure monitoring and maintenance requirements?	NA	
7045.0506 2	Do the cost estimates include yearly adjustments for inflation?	<del>NA</del> <sup>DFC</sup> NA	
7045.0508 1	Does the facility have financial assurance for postclosure care?	NA	
FC: Corrective Action (at a TSD Facility)			
Rule	Requirement	Compliance Status	Remarks
7045.0485 1	Is the Regulated Party undertaking corrective action as necessary for all releases to the environment, to protect human health and the environment?	NA	
7045.0485 2	Does the Regulated Party's permit contain schedules of compliance for required corrective action?	NA	
7045.0512 1	Does the Regulated Party have a written estimate of the cost to perform corrective action?	NA	
7045.0512 2	Is there a yearly update of the cost estimate for corrective action?	NA	
7045.0514 1	Is there assurance of financial responsibility for completing corrective action?	NA	

**FC: Transporters**

Rule	Requirement	Compliance Status	Remarks
7045.0302 4	If facility imports hazardous waste from a foreign country, are manifest requirements met? (Generator EPA ID not needed. Importer's address and signature can replace generator's.)	NA	

**FC: Record Keeping Requirements**

Rule	Requirement	Compliance Status	Remarks
7045.0454 6, A	Do the records contain job titles?	C	

## Minnesota Pollution Control Agency

Report Title: Large Quantity Generator (LQG) Compliance Evaluation Inspection Checklist

Preferred ID: *MND981097884* Regulated Party: *Safety Kleen - Eagan*

Date: *04/20/2016* Inspector: *Dan Chachakis*

<b>G1: Licensing / EPA / Permits</b>			
Rule	Requirement	Compliance Status	Remarks
7045.0221	Has Regulated Party obtained a generator identification number?	<i>C</i>	
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	<i>C</i>	
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	<i>NA</i>	
7045.0230 1, B	Outstate - Did the Regulated Party include all hazardous waste streams on its license application?	<i>NA</i>	
7045.0225 2	Is the Regulated Party's license displayed in a public area at the licensed site?	<i>C</i>	
7001.0520 1, A	Does the Regulated Party operate as a TSD without a permit?	<i>NA</i>	<i>Also a TSD with a Permit</i>
MS 116.48 1	Are aboveground tanks >500 G registered with the MPCA? Are underground tanks registered with the MPCA?	<i>C</i>	
<b>G1: Waste Evaluation</b>			
Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	<i>C</i>	<i>Received at the facility</i>
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	<i>C</i>	<i>Safety Kleen Corporate System</i>



### G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1	Is hazardous waste properly disposed of?	C	
7045.0208 1, E	Does the Regulated Party comply with the POTW requirements for sewerage hazardous waste?	NA	No Sewering
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?	C	Permit
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	C	"
7045.0568 3	Has the Regulated Party documented in its operating record the arrangements made with local emergency authorities?	C	"
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	NA	
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the Regulated Party follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?	NA	
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	NA	
7045.0845	Does the Regulated Party properly manage used oil?	C	Stores used oil from other facility
7045.0895 4	Has used oil accepted from or given to another business to be burned for energy recovery been tested to determine that it is on-specification?	C	Gets Re-refined at another facility

### G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil leaving the generator site for at least three years?	C	
7045.0805	Does the Regulated Party properly manage used oil-contaminated waste?	C	Vac Truck
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil-contaminated waste leaving the generator site for at least three years?	C	
7045.0990	Is the Regulated Party properly managing used oil filters?	C	
7045.0990 3, C, 3	Does the Regulated Party keep records of all used oil filters taken off-site by used oil-filter transporters for at least three years?	C	Oil filter Recycled in Astoria, IL

### G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	C	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to Regulated Party personnel?	C	
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?	C	
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	C	

### G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment) ?	C	Only outside hydrant water
7045.0566 4	Is emergency equipment tested and maintained?	C	
7045.0566 5	Does the Regulated Party provide all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled with immediate access to an internal alarm or emergency communication device?	C	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc)?	C	
7060.0600 2	Has the Regulated Party discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	NA	
7045.0275 2	If the Regulated Party had a release to the environment did the Regulated Party immediately notify the agency?	NA	
7045.0275 3	If the Regulated Party has had a release, did the Regulated Party recover as rapidly and as thoroughly as possible, any HW that has leaked, spilled, or otherwise escaped a container?	NA	
7045.0855 2, D	Upon detection of a release of used oil to the environment (not originating from a UST) did the Regulated Party stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials contaminated with used oil, and repair or replace any leaking used oil storage equipment prior to returning it to service to prevent future releases?	NA	



### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 1, F	Are hazardous waste containers & tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	C	
7045.0292 1, C	Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR Is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?	C	
7045.0292 1, A	Has the generator stored HW for more than 90 days beyond the waste accumulation start date?	C	
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles & equipment?	C	
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	C	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	C	
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?	C	
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?	C	
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?	C	
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?	C	Daily Document in Computer System

### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0626 6	Are incompatible wastes adequately separated?	C	
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	C	
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	C	On IPAD daily inspect list
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	NA	None full
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	NA	None full
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	C	
7045.0855 2, C	Are wastes contaminated with used oil stored in containers or tanks that are in good condition, on impermeable surfaces, closed, and labeled "Used Oil" or "Used Oily Waste"?	C	
7045.0990 3, A	If used oil filters are stored, are they stored in containers that are closed, leakproof and labeled "Used Oil Filters"?	C	
273.14 (a)	Are universal waste batteries (each battery), or a battery storage container, labeled with: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"?	C	
273.13 (a)	Are universal waste batteries (lead acid, NiCad, etc) that show evidence of leakage, spillage, or damage stored in a closed, structurally sound, compatible container?	NA	

### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
273.14 (e)	Are containers of universal waste lamps labeled with: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"?	C	
273.13 (d)	Are universal waste lamps stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible? Do containers lack evidence of leakage, spillage, or damage?	C	
273.13 (c)	Is mercury containing equipment stored in closed containers that are structurally sound, compatible with the contents of the device? Does the container lack evidence of leakage, spillage, or damage?	NA	
273.14 (d)	Is mercury containing equipment (i.e. each device) or a container in which the equipment is contained labeled with: "Universal Waste - Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury -Containing Equipment"?	NA	

### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261 1	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)	C	
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	C	
7045.0265 1, D	Have copies of manifests signed by the generator and transporter been sent to the MPCA within five working days of the initial transporter's acceptance of the waste?	C	
7045.0265 4, A	Have copies of manifests signed by the facility been sent to the MPCA within 40 days of the acceptance of the waste by the facility?	C	

### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	NA	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	C	
7045.0302 1	If Regulated Party exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc)	NA	

### G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	C	With each manifest

### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training program?	C	
7045.0558 2	Does the Regulated Party have a hazardous waste program director trained in hazardous waste management procedures?	C	John Curl, in Texas office
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	C	



### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	C	
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	C	
7045.0558 6, A	Does the Regulated Party maintain training records which include a job title for each position at the facility related to hazardous waste?	C	
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	C	
7045.0558 6, C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	C	
7045.0558 6, D	Has the Regulated Party kept records that document that the initial training and annual review training has been given?	C	
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves.)?	C	

### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the Regulated Party have a contingency plan?	C	
7045.0574 1	Does the Regulated Party have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources?)	C	

G1: Contingency Plan			
Rule	Requirement	Compliance Status	Remarks
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?	C	
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders?	C	
7045.0572 4, D	Does the plan include up-to-date name, address and Home and Work phone numbers for emergency coordinators?	C	
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?	C	
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?	C	
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?	C	
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?	C	Records in file
7045.0572 6	Has the contingency plan been amended when necessary? (rule change, emerg.eqpt change, process change, emerg. coord. change, plan failed)	C	Amending with 2015 permit submission

**ATTACHMENT B**  
**Documents Copied**





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Emplid # Name	Job Code	Job Title	Deptid	Location	Supv ID	Supervisor Name	EE Type	EE Stat
054307 0 Zink, Todd	610382	Manager AC 1	77EAA	MN-EAGAN	011631	Tyson, Scott H	EMP	A
Required Courses		Completed Courses		Course Deficiency & Expiry Status				
Course Description	Course Description	Issue Date	Course Description	Crs Status	Trn Status	Expiry Dt	Due Equiv Day Taken	
CA1002 Ethics Policy Training	ET140 RCRA SK Site Specific Tra	04/08/2016	* HS0005 NEW EMPLOYEE H&S ORIENTAT	Never Taken	Delinquent			
CS1000 Beacon Overview	CS1000 Beacon Overview	10/27/2015	* HS0050 Hazard Recognition	Never Taken	Delinquent			
CS3000 Beacon 1 - Create/Edit Co	CS3000 Beacon 1 - Create/Edit Co	10/27/2015	* HS1049 09 - Cold/Fire	Never Taken	Delinquent			
CS3005 Beacon 2 - Searching	CS3005 Beacon 2 - Searching	10/27/2015	* HS4031 Walking/Working Surface H	Never Taken	Delinquent			
CS3010 Beacon 3 - Contacts	CS3010 Beacon 3 - Contacts	10/27/2015	* HS4032 Flam/Combustible Liquid S	Never Taken	Delinquent			
CS3015 Beacon 4 - Messenger/Sett	CS3015 Beacon 4 - Messenger/Sett	10/27/2015	* HS4055 Lockout/Tagout Affected	Never Taken	Delinquent			
CS3030 Beacon 7 - Call Notes	CS3030 Beacon 7 - Call Notes	10/27/2015	* HS6071 Quantitative Fit Test	Expired	Delinquent	04/08/2016	HS6070	
CS3035 Beacon 8 - Credit/Collect	CS3035 Beacon 8 - Credit/Collect	10/27/2015	* HS6122 Fire Extinguisher Trainin	Never Taken	Delinquent			
CS3040 Beacon 9 - Invoiced Order	CS3040 Beacon 9 - Invoiced Order	10/27/2015	* HS6301 1 of 8 Globally Harm Sys	Never Taken	Delinquent			
CS3060 Beacon 13 - Company Instr	CS3060 Beacon 13 - Company Instr	10/27/2015	* HS6302 2 of 8 Medical/Bloodborne	Never Taken	Delinquent			
ED13MG Prev Workplace Harassment	MT6000 Compatibility Workbench	10/23/2015	* HS6303 3 of 8 Respiratory Protec	Never Taken	Delinquent			
HS0005 NEW EMPLOYEE H&S ORIENTAT	MT6001 Electronic Inspections	10/23/2015	* HS6304 4 of 8 Conf Space/Heat St	Never Taken	Delinquent			
HS0050 Hazard Recognition	MT6002 Compliance Calendar	10/23/2015	* MT2065 Search & Inspection Polic	Never Taken	Delinquent			
HS1049 09 - Cold/Fire	MT6003 Tank Management System	10/23/2015	* MT2070 Search & Inspection Polic	Never Taken	Delinquent			
HS2100 OSHA 24 Hour Hazwoper	MT6004 Incident Management Workb	10/23/2015	ET177A PatriotAct-Emp-HazMat Sec	Expired	Delinquent	04/16/2013		
HS4020 Powered Indus Truck (Fork	MT6005 Leak Detection & Repair S	10/23/2015	ET177B PatriotAct-Sup-HazMat Sec	Expired	Delinquent	07/12/2009		
HS4026 Powered Ind Truck Refresh	MT6006 Cert of Disposal Workbench	10/23/2015	ET237 Drum Inspection & Closure	Expired	Delinquent	04/16/2013		
HS4031 Walking/Working Surface H	MT6008 Hub Compliance Workbench	10/23/2015	ET5040 Def Driv Zurich Commercia	Due Again	Compliant	06/30/2016	71	
HS4032 Flam/Combustible Liquid S	MT6009 Off-C Workbench	10/23/2015	SS2035 SPCC Training	Expired	Delinquent	04/16/2011		
HS4055 Lockout/Tagout Affected	ET2002 DOT Regulation Haz Mat Em	06/23/2015						
HS6071 Quantitative Fit Test	HS1047 07 of 08 -Emergency Respo	06/02/2015						
HS6122 Fire Extinguisher Trainin	HS1048 08 of 08 - Drum & Materia	06/02/2015						
HS6301 1 of 8 Globally Harm Sys	HS1045 05 of 08 - PPE/Hearing	05/22/2015						
HS6302 2 of 8 Medical/Bloodborne	HS1046 06 of 08 - Decontaminatio	05/22/2015						
HS6303 3 of 8 Respiratory Protec	HS1043 03 of 08 - Resp. Protecti	04/08/2015						
HS6304 4 of 8 Conf Space/Heat St	HS1044 04 of 08 - Conf. Space/He	04/08/2015						
MT1166 Alcohol & Drug Free Wkpl	HS6070 Qualitative Fit Test	04/08/2015						
MT2020 Supervisor Safety Dvlpmnt	ET140 RCRA SK Site Specific Tra	04/07/2015						
MT2030 Overview of Clean Harbors	HS1041 01 of 08 - HAZCOM (GHS 20	03/17/2015						
MT2065 Search & Inspection Polic	HS1042 02 of 08 - Medical/Bloodb	03/17/2015						
MT2070 Search & Inspection Polic	ET5040 Def Driv Zurich Commercia	06/30/2014						
MT3009 Trip & Dispatch App/Workb	HS4020 Powered Indus Truck (Fork	06/19/2014						
MT4001 Asset Mgmt Program Overvi	HS0030 Safety Stand Down	04/22/2014						
MT4005 Assets Requiring Attentio	ED13MG Prev Workplace Harassment	04/10/2014						
MT4010 My Assets	CT0022 Forklift (classroom only)	04/09/2014						
MT4015 Short Term Rental	ET140 RCRA SK Site Specific Tra	04/07/2014						
MT4020 Permit and Registrations	HS1041 01 of 08 - HAZCOM (GHS 20	04/07/2014						
MT4025 DVIR Entry WIN	HS2200 HAZWOPER 8 Hr Annual Refr	04/07/2014						
MT6000 Compatibility Workbench	HS6071 Quantitative Fit Test	04/07/2014						
MT6001 Electronic Inspections	VID001 We are CH - Introduction	03/24/2014						
MT6002 Compliance Calendar	VID002 We are CH - Our History	03/24/2014						
MT6003 Tank Management System	VID003 We are CH - Our Core Valu	03/24/2014						
MT6004 Incident Management Workb	VID004 We are CH - Our Business	03/24/2014						
MT6006 Cert of Disposal Workbench	VID005 We are CH - Our Customers	03/24/2014						
MT6008 Hub Compliance Workbench	VID006 We are CH - What to Expec	03/24/2014						
MT6009 Off-C Workbench	VID007 We are CH - Our Future	03/24/2014						

ET 140 fn 2005  
Missing

ET 140  
not listed



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054307 0 Zink, Todd	610382	Manager AC 1	77EAA	MN-EAGAN	011631	Tyson, Scott H	EMP	A
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Required Courses	Completed Courses		Course Deficiency & Expiry Status					
Course Description	Course Description	Issue Date	Course Description	Crs_Status	Trn_Status	Expiry Dt	Due Equiv	Day Taken

VID008	We are CH - What Won't Ch	03/24/2014
MT1166	Alcohol & Drug Free Wkpl	03/19/2014
MT2020	Supervisor Safety Dvlpmnt	01/23/2014
MT3020	PSHR Training Entry/Repor	10/16/2013
EV0244	Fatigue Management Traini	10/08/2013
EV0268	Safety Orientation Online	10/08/2013
CA1002	Ethics Policy Training	10/07/2013
ET5025	Vehicle Inspection Progra	10/07/2013
VID300	Safety 3-6-5 Alan McKim M	09/04/2013
MT3009	Trip & Dispatch App/Workb	08/30/2013
MT4010	My Assets	08/30/2013
MT4015	Short Term Rental	08/30/2013
MT4020	Permit and Registrations	08/30/2013
MT4025	DVIR Entry WIN	08/30/2013
MT4001	Asset Mgmt Program Overvi	08/28/2013
MT4005	Assets Requiring Attentio	08/28/2013
HS7147	Global Harmonization Stan	08/02/2013
ED102	EE Handbook Code of Condu	04/15/2013
ET140	RCRA SK Site Specific Tra	04/09/2013
HS2200	HAZWOPER 8 Hr Annual Refr	04/09/2013
ET105	SK EMS/ISO14001 Training	04/08/2013
ET140	RCRA SK Site Specific Tra	04/08/2013
SS2032	Contingency Plan Drill	05/07/2012
ET140	RCRA SK Site Specific Tra	04/09/2012
ET2003	DOT Refresher for Haz Mat	04/09/2012
HS2200	HAZWOPER 8 Hr Annual Refr	04/09/2012
CT0022	Forklift (classroom only)	12/02/2011
O35007	Mat Pkging/Lbling/Marking	12/02/2011
CT0034	Forklift Hands-on Evaluat	12/01/2011
ED103	Code of Conduct Training	10/05/2011
M82014	Empty Container Program	10/05/2011
O35005	Req Com Carriers/OffSite	10/05/2011
O21008	Comp Dist Uniform Hazwast	05/31/2011
ET140	RCRA SK Site Specific Tra	04/05/2011
HS2200	HAZWOPER 8 Hr Annual Refr	04/05/2011
SS1230	EMS Awareness Training	04/05/2011
ET010	CSA 2010	08/31/2010
ET105	SK EMS/ISO14001 Training	08/19/2010
ET140	RCRA SK Site Specific Tra	08/19/2010
HS2200	HAZWOPER 8 Hr Annual Refr	08/19/2010
SS2032	Contingency Plan Drill	06/13/2010
ED3201	AC DC Facility Manager 1	04/16/2010
ED3202	AC DC Facility Manager 2	04/16/2010
ET177A	PatriotAct-Emp-HazMat Sec	04/16/2010
ET237	Drum Inspection & Closure	04/16/2010
O31011	Vehicle Fuel Purchases (S	04/16/2010





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054307 0 Zink,Todd	610382	Manager AC 1	77EAA	MN-EAGAN	011631	Tyson,Scott H	EMP	A

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Required Courses		Completed Courses		R e g	Course Deficiency & Expiry Status			Due Equiv	
Course Description	Course Description	Issue Date	Course Description		Crs_Status	Trn_Status	Expiry Dt	Day Taken	
	O31012 Medical Records in Cust W	04/16/2010							
	O32009 Rotary Drum Washer Motor	04/16/2010							
	O32014 Appearance Stand PW Conta	04/16/2010							
	O35008 Discarded Commodities Sec	04/16/2010							
	O42006 SK Vehicle Inspection Pro	04/16/2010							
	O43001 Prep/Resp Nat Disaster Pa	04/16/2010							
	O51004 Mngng Pending Waste Recor	04/16/2010							
	SS2035 SPCC Training	04/16/2010							
	SS3095 Driving Safety	04/16/2010							
	ET140 RCRA SK Site Specific Tra	08/19/2009							
	ET2003 DOT Refresher for Haz Mat	08/19/2009							
	HS2200 HAZWOPER 8 Hr Annual Refr	08/19/2009							
	SS2032 Contingency Plan Drill	05/19/2009							
	ET2003 DOT Refresher for Haz Mat	04/08/2009							
	ED103 Code of Conduct Training	03/25/2009							
	CT0034 Forklift Hands-on Evaluat	11/07/2008							
	ET140 RCRA SK Site Specific Tra	08/25/2008							
	ET2003 DOT Refresher for Haz Mat	08/25/2008							
	HS2200 HAZWOPER 8 Hr Annual Refr	08/25/2008							
	M91002 Damaged Product Return	06/02/2008							
	SS1230 EMS Awareness Training	06/02/2008							
	O32018 Equipment Wipe Down Proce	10/29/2007							
	O35006 Restricted Waste	10/29/2007							
	ET105 SK EMS/ISO14001 Training	07/27/2007							
	ET140 RCRA SK Site Specific Tra	07/27/2007							
	HS2200 HAZWOPER 8 Hr Annual Refr	07/27/2007							
	HS6071 Quantitative Fit Test	07/27/2007							
	O35006 Restricted Waste	03/19/2007							
	M61001 Imaging Services Procedur	03/14/2007							
	ET1002 ISO / EMS Overview	11/29/2006							
	ET2010 Hours of Service/Log Book	11/05/2006							
	ED275 Civil Treatment Managers	09/11/2006							
	HS6071 Quantitative Fit Test	08/22/2006							
	ET177A PatriotAct-Emp-HazMat Sec	07/12/2006							
	ET177B PatriotAct-Sup-HazMat Sec	07/12/2006							
	ET237 Drum Inspection & Closure	06/26/2006							
	O32012 Variance to Corporate BOG	06/22/2006							
	ET1002 ISO / EMS Overview	06/08/2006							
	ET140 RCRA SK Site Specific Tra	06/08/2006							
	ET177A PatriotAct-Emp-HazMat Sec	06/08/2006							
	HS2200 HAZWOPER 8 Hr Annual Refr	06/08/2006							
	M21003 Sales Usage Service ARMAK	06/08/2006							
	M62002 Healthcare Mailback Servi	06/08/2006							
	M71008 Brake Shavings Service	06/08/2006							
	O43002 SK Spill Response Procedu	06/08/2006							
	SS2032 Contingency Plan Drill	06/08/2006							



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Required Courses			Completed Courses			Course Deficiency & Expiry Status			Due Equiv	
Course Description	Course Description	Issue Date	Course Description	Issue Date	Crse Status	Trn Status	Expiry Dt	Day Taken		
	ET141 RCRA -- SK Overview	03/22/2006								
	ET1EPA EMS Provided by US EPA	02/06/2006								
	HS4020 Powered Indus Truck (Fork	10/05/2005								
	WHR003 DrugFree Workplace US Sup	10/05/2005								
	CT0034 Forklift Hands-on Evaluat	10/04/2005								
	O22004 Confined Space Proc (SK B	09/14/2005								
	O31005 Sample Shipments (SK)	08/22/2005								
	ET177A PatriotAct-Emp-HazMat Sec	07/21/2005								
	HS6071 Quantitative Fit Test	07/21/2005								
	CS3160 Container Management Trai	07/08/2005								
	ET2094 Placarding	07/08/2005								
	ET5017 Management of Used Oil	07/08/2005								
	ET6001 Waste Minimization Progra	07/08/2005								
	M13001 Mgt Product Changes Proce	07/08/2005								
	M21001 Parts Washer Service Proc	07/08/2005								
	M21004 SK Recycle-Kleen 250 Proc	07/08/2005								
	M33001 Total Project Management	07/08/2005								
	M41001 SKOS/SKVS Pregual Analysi	07/08/2005								
	M44001 Contaminant Event Respns	07/08/2005								
	M51001 Thinner Exchange Program	07/08/2005								
	M51002 16/30 Gal Waste Paint Ser	07/08/2005								
	M51003 Spray Gun Cleaner	07/08/2005								
	M51005 Minimizer Procedures	07/08/2005								
	M52002 Dry Cleaning Service	07/08/2005								
	M61003 Imaging Washwater Recyl U	07/08/2005								
	M71004 Waste Gas Filter Service	07/08/2005								
	M71009 Bulk Cntr Used Oil Fltr A	07/08/2005								
	M82004 CornCob/Lite Dry Absorben	07/08/2005								
	M82005 Polypropylene Services	07/08/2005								
	M82006 Flours Light Ballast w/PC	07/08/2005								
	M82009 Container Dropoff	07/08/2005								
	MC2102 COMS and Call In Services	07/08/2005								
	O21002 Req for Gen EPAID # & Man	07/08/2005								
	O21003 Manifest Mngmnt Accountab	07/08/2005								
	O21004 Management of Periodic Re	07/08/2005								
	O21005 Blank Manifest Ordering P	07/08/2005								
	O21007 Tran Fac Manifest SignReq	07/08/2005								
	O22001 Incident Report Form Proc	07/08/2005								
	O22002 Transportation Cont Plan	07/08/2005								
	O22003 Managing Misdirected Wast	07/08/2005								
	O22005 Compliance with Subpart B	07/08/2005								
	O23001 SK Corp Waste Track Guide	07/08/2005								
	O24001 Eyewash Inspection Proced	07/08/2005								
	O24002 Regulatory Inspection Pre	07/08/2005								
	O25001 Aerosol/Batt/Ewaste/Bulb	07/08/2005								
	O25002 Return/Fill & Waste/Debri	07/08/2005								





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Required Courses		Completed Courses		Course Deficiency & Expiry Status		Due	Equiv
Course Description	Course Description	Issue Date	Course Description	Crs Status	Trn Status	Expiry Dt	Day Taken
	031002 Accident&Injury Claims Re	07/08/2005					
	032001 Branch Aqueous Waste Mngm	07/08/2005					
	032003 Cust Core Waste Class Cha	07/08/2005					
	032004 Eval & Return of Parts Cl	07/08/2005					
	032005 Branch Continued Use Prog	07/08/2005					
	032010 Maint Permits/EMS Doc SK	07/08/2005					
	033001 Daily Reconciliation Proc	07/08/2005					
	033004 Premium Solvent Control P	07/08/2005					
	033006 Aqueous Chemistry QC	07/08/2005					
	033007 Branch Waste Sol Tank Cle	07/08/2005					
	033008 Aqueous Blending/Proporti	07/08/2005					
	033010 KLEEN ALERT Cont Count Di	07/08/2005					
	035001 Transfer Fac Operations/P	07/08/2005					
	035002 Containers Prep for Load&	07/08/2005					
	035004 Disposition Unused SK Che	07/08/2005					
	042004 Safety/Committee Meeting	07/08/2005					
	051001 Annual Recharacterization	07/08/2005					
	SS3249 Equip Maintenance&Calibra	07/08/2005					
	M32001 Non-conforming waste	06/29/2005					
	M83003 FLUIDKLEEN Filtration Sys	06/29/2005					
	051003 Daily & Service Document	06/29/2005					
	M83003 FLUIDKLEEN Filtration Sys	06/21/2005					
	051003 Daily & Service Document	06/21/2005					
	M32001 Non-conforming waste	06/20/2005					
	M51005 Minimizer Procedures	02/05/2005					
	033006 Aqueous Chemistry QC	02/05/2005					
	CS3160 Container Management Trai	01/29/2005					
	ET2094 Placarding	01/29/2005					
	ET5017 Management of Used Oil	01/29/2005					
	ET6001 Waste Minimization Progra	01/29/2005					
	M13001 Mgt Product Changes Proce	01/29/2005					
	M21001 Parts Washer Service Proc	01/29/2005					
	M21004 SK Recycle-Kleen 250 Proc	01/29/2005					
	M33001 Total Project Management	01/29/2005					
	M41001 SKOS/SKVS Prequal Analysi	01/29/2005					
	M44001 Contaminant Event Respnse	01/29/2005					
	M51001 Thinner Exchange Program	01/29/2005					
	M51002 16/30 Gal Waste Paint Ser	01/29/2005					
	M51003 Spray Gun Cleaner	01/29/2005					
	M52002 Dry Cleaning Service	01/29/2005					
	M61003 Imaging Washwater Recyl U	01/29/2005					
	M71002 Brake Fluid Collection Pr	01/29/2005					
	M71004 Waste Gas Filter Service	01/29/2005					
	M71009 Bulk Cntr Used Oil Fltr A	01/29/2005					
	M82004 CornCob/Lite Dry Absorben	01/29/2005					
	M82005 Polypropylene Services	01/29/2005					



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Emplid # Name	Job Code	Job Title	Deptid	Location	Supv ID	Supervisor Name	EE Type	EE Stat
054307 0 Zink,Todd	610382	Manager AC 1	77EAA	MN-EAGAN	011631	Tyson,Scott H	EMP	A

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Required Courses	Completed Courses	Issue Date	Course Deficiency & Expiry Status	Due Equiv
Course Description	Course Description	Issue Date	Course Description	Day Taken
			Crs Status	Trn Status
			Expiry Dt	
	M82006 Flours Light Ballast w/PC	01/29/2005		
	M82009 Container Dropoff	01/29/2005		
	O21002 Req for Gen EPAID # & Man	01/29/2005		
	O21003 Manifest Mngmnt Accountab	01/29/2005		
	O21004 Management of Periodic Re	01/29/2005		
	O21005 Blank Manifest Ordering P	01/29/2005		
	O21007 Tran Fac Manifest SignReq	01/29/2005		
	O22001 Incident Report Form Proc	01/29/2005		
	O22002 Transportation Cont Plan	01/29/2005		
	O22003 Managing Misdirected Wast	01/29/2005		
	O22005 Compliance with Subpart B	01/29/2005		
	O23001 SK Corp Waste Track Guide	01/29/2005		
	O24001 Eyewash Inspection Proced	01/29/2005		
	O24002 Regulatory Inspection Pre	01/29/2005		
	O25001 Aerosol/Batt/Ewaste/Bulb	01/29/2005		
	O25002 Return/Fill & Waste/Debri	01/29/2005		
	O31002 Accident&Injury Claims Re	01/29/2005		
	O32001 Branch Aqueous Waste Mngm	01/29/2005		
	O32003 Cust Core Waste Class Cha	01/29/2005		
	O32004 Eval & Return of Parts Cl	01/29/2005		
	O32005 Branch Continued Use Prog	01/29/2005		
	O32010 Maint Permits/EMS Doc SK	01/29/2005		
	O33001 Daily Reconciliation Proc	01/29/2005		
	O33004 Premium Solvent Control P	01/29/2005		
	O33007 Branch Waste Sol Tank Cle	01/29/2005		
	O33008 Aqueous Blending/Proporti	01/29/2005		
	O33010 KLEEN ALERT Cont Count Di	01/29/2005		
	O35001 Transfer Fac Operations/P	01/29/2005		
	O35002 Containers Prep for Load&	01/29/2005		
	O35004 Disposition Unused SK Che	01/29/2005		
	O42004 Safety/Committee Meeting	01/29/2005		
	O51001 Annual Recharacterization	01/29/2005		
	SS3249 Equip Maintenance&Calibra	01/29/2005		
	ET160 SK Entry Level Driver Tra	11/05/2004		
	CS3160 Container Management Trai	06/21/2004		
	ET105 SK EMS/ISO14001 Training	06/21/2004		
	HS2200 HAZWOPER 8 Hr Annual Refr	05/20/2004		
	ET140 RCRA SK Site Specific Tra	05/06/2004		
	ET177A PatriotAct-Emp-HazMat Sec	11/20/2003		
	ET2010 Hours of Service/Log Book	11/20/2003		
	ED231 SK Union Avoidance (US)	11/06/2003		
	MT1045 Performance Appraisals	08/20/2003		
	ET140 RCRA SK Site Specific Tra	08/12/2003		
	WHR003 DrugFree Workplace US Sup	06/18/2003		
	ET237 Drum Inspection & Closure	05/21/2003		
	ET2002 DOT Regulation Haz Mat Em	04/10/2003		





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Emplid # Name	Job Code	Job Title	Deptid	Location	Supv ID	Supervisor Name	EE Type	EE Stat
054307 0 Zink, Todd	610382	Manager AC 1	77EAA	MN-EAGAN	011631	Tyson, Scott H	EMP	A

&lt;CONTINUED&gt;

Required Courses			Completed Courses			Course Deficiency & Expiry Status				Due Equiv
Course Description	Course Description	Issue Date	Course Description	Crs Status	Trn Status	Expiry Dt	Day Taken			
	ET2010 Hours of Service/Log Book	04/10/2003								
	ET4051 Pre/Post Trip Inspections	04/10/2003								
	HS5206 Defensive Driving	01/02/2003								
	ET2002 DOT Regulation Haz Mat Em	12/19/2002								
	HS2200 HAZWOPER 8 Hr Annual Refr	10/11/2002								
	ET140 RCRA SK Site Specific Tra	08/12/2002								
	CT0034 Forklift Hands-on Evaluat	06/18/2002								
	HS2200 HAZWOPER 8 Hr Annual Refr	11/08/2001								
	ET140 RCRA SK Site Specific Tra	10/01/2001								
	ET2010 Hours of Service/Log Book	06/06/2001								
	ET4060 Load Securement	06/06/2001								
	HS2200 HAZWOPER 8 Hr Annual Refr	10/24/2000								
	HS6025 Bloodborne Pathogens	10/24/2000								
	HS6130 Accident Investigation	09/26/2000								
	ET4060 Load Securement	07/11/2000								
	ET237 Drum Inspection & Closure	06/06/2000								
	ET140 RCRA SK Site Specific Tra	04/24/2000								
	HS4020 Powered Indus Truck (Fork	12/01/1999								
	HS2200 HAZWOPER 8 Hr Annual Refr	11/09/1999								
	WHR002 DrugFree Workplace US Emp	11/09/1999								
	ET2002 DOT Regulation Haz Mat Em	10/31/1999								
	ET140 RCRA SK Site Specific Tra	05/06/1999								
	HS2000 OSHA 40 Hour Hazwoper	06/09/1987								
	SS2016 New Employee Orientation	06/20/1983								



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Emplid # Name	Job Code	Job Title	Deptid	Location	Supv ID	Supervisor Name	EE Type	EE Stat
050734 0 Conant,Dale S	610308	Driver OTR	77EAF	MN-EAGAN	054307	Zink,Todd	EMP	A

Required Courses		Completed Courses		Course Deficiency & Expiry Status				Due Equiv
Course Description	Course Description	Issue Date	Course Description	Crs_Status	Trn_Status	Expiry Dt	Day Taken	
	OS1001 Annual Recharacterization	06/22/2006						
	OS1003 Daily & Service Document	06/22/2006						
	ET1002 ISO / EMS Overview	06/08/2006						
	ET140 RCRA SK Site Specific Tra	06/08/2006						
	ET177A PatriotAct-Emp-HazMat Sec	06/08/2006						
	HS2200 HAZWOPER 8 Hr Annual Refr	06/08/2006						
	M21003 Sales Usage Service ARMAK	06/08/2006						
	M62002 Healthcare Mailback Servi	06/08/2006						
	M71008 Brake Shavings Service	06/08/2006						
	O43002 SK Spill Response Procedu	06/08/2006						
	SS2032 Contingency Plan Drill	06/08/2006						
	CT0034 Forklift Hands-on Evaluat	10/04/2005						
	ET177A PatriotAct-Emp-HazMat Sec	07/29/2005						
	HS6071 Quantitative Fit Test	07/29/2005						
	M32001 Non-conforming waste	06/29/2005						
	O42006 SK Vehicle Inspection Pro	06/29/2005						
	SS3095 Driving Safety	06/29/2005						
	ET160 SK Entry Level Driver Tra	05/27/2005						
	CS3160 Container Management Trai	01/29/2005						
	ET2094 Placarding	01/29/2005						
	ET6001 Waste Minimization Progra	01/29/2005						
	O21007 Tran Fac Manifest SignReq	01/29/2005						
	O22002 Transportation Cont Plan	01/29/2005						
	O31002 Accident&Injury Claims Re	01/29/2005						
	O33004 Premium Solvent Control P	01/29/2005						
	O35001 Transfer Fac Operations/P	01/29/2005						
	ET160 SK Entry Level Driver Tra	11/05/2004						
	CS3160 Container Management Trai	06/21/2004						
	ET105 SK EMS/ISO14001 Training	06/21/2004						
	ET177A PatriotAct-Emp-HazMat Sec	11/20/2003						
	ET2010 Hours of Service/Log Book	11/20/2003						
	ET140 RCRA SK Site Specific Tra	07/25/2003						
	HS2200 HAZWOPER 8 Hr Annual Refr	07/25/2003						
	ET2002 DOT Regulation Haz Mat Em	04/10/2003						
	ET2010 Hours of Service/Log Book	04/10/2003						
	ET4051 Pre/Post Trip Inspections	04/10/2003						
	ET237 Drum Inspection & Closure	01/16/2003						
	HS2200 HAZWOPER 8 Hr Annual Refr	10/18/2002						
	HS4020 Powered Indus Truck (Fork	09/23/2002						
	ET140 RCRA SK Site Specific Tra	08/05/2002						
	HS5206 Defensive Driving	06/28/2002						
	ET2002 DOT Regulation Haz Mat Em	06/27/2002						
	HS2100 OSHA 24 Hour Hazwoper	06/24/2002						
	SS2016 New Employee Orientation	06/24/2002						

missing ET 140 RCRA  
in 2004 and 2005



## Safety-Kleen Regulatory Training Matrix

SK Course Code	Course Description	When	Facility Mgr	Service Rep	Admin Support	Material Handler	Sales Support
HS-101	24-Hour Hazwoper	Initial	✓	✓		✓	✓
HS-104	8-Hour Hazwoper Refresher	Annual	✓	✓		✓	✓
HS-107	Controlled Substance Abuse Training	Initial	✓	✓	✓	✓	✓
HMTS	Hazardous Materials Transportation Skills	Initial Triennial	✓	✓	✓	✓	✓
ET-176	Driver Safety Training	Initial Triennial	✓	✓			✓
ET-237	Drum Inspection and Closure	Initial Triennial	✓	✓		✓	✓
ET-140	RCRA Update	Annual	✓	✓	✓	✓	✓
HS-106	Health & Safety for Admin	Initial Triennial			✓		
ET-144	Completing the Material Profile	Initial					✓
OB_430002	Spill Response Procedure	Initial	✓	✓		✓	✓
OB_210002	Req for Generators: EPA ID # & Manifests	Initial	✓	✓	✓	✓	✓
OB_210008	Completing the Uniform Hazwaste Manifest	Initial	✓	✓	✓	✓	✓





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### Facility Emergency Equipment

(See Exhibit I.E-6 for Specific Location for Equipment)

Description	Location	Quantity	Capabilities
Dry Chemical Fire Extinguishers-Hand held (type ABC)	Office area, warehouse, storage shed, return and fill building	7	Able to extinguish type A, B, and C fires
First Aid Kits	Office/warehouse area	2	Provides items used to give basic medical attention
Eye wash station	Warehouse area, at return and fill	3	Provide a means of rinsing possibly harmful substances from the eyes and skin
Shower	Office area, warehouse area	2	Decontaminate plant personnel in the event of a spill or release of harmful material
Telephones/paging system	Office/warehouse area, return and fill	9	Alert personnel of an on-site emergency or spill incident, evacuation orders and general in-plant communications
Spill Kits / Absorbents	Tank farm, warehouse, return and fill areas	3	Able to contain and absorb spilled liquids  There is also a supply of absorbents for sale that can be accessed in the event of an emergency

